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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,)	NO. CV 08-4792 PSG (Ex)
)	
Plaintiff,)	[PROPOSED]
)	
v.)	CONSENT JUDGMENT OF FORFEITURE
)	
A 2007 CHEVROLET SUBURBAN)	
1500; \$105,851.00 IN U.S.)	
CURRENCY,)	
)	
Defendants.)	
)	
_____ ANNETTE CHACON; ROLAND)	
HURTADO,)	
)	
Claimants)	
_____)	

This action was filed on July 22, 2008. Notice was given and published in accordance with law. Annette Chacon and Roland Hurtado ("Claimants") filed claims on November 26, 2008, and

1 answers on January 14, 2009. No other claims or answers have
2 been filed, and the time for filing claims and answers has
3 expired. Plaintiff and claimant have reached an agreement that
4 is dispositive of the action. The parties hereby request that
5 the Court enter this Consent Judgment of Forfeiture.

6 **WHEREFORE, IT IS ORDERED, ADJUDGED AND DECREED:**

7 1. This court has jurisdiction over the parties and the
8 subject matter of this action.

9 2. Notice of this action has been given in accordance with
10 law. All potential claimants to the defendant currency other
11 than Claimants are deemed to have admitted the allegations of the
12 Complaint. The allegations set out in the Complaint are
13 sufficient to establish a basis for forfeiture.

14 3. The United States of America shall have judgment as to
15 \$50,000.00 of the defendant currency and all interest earned
16 thereon, and no other person or entity shall have any right,
17 title or interest therein. The United States Marshals Service is
18 ordered to dispose of said assets in accordance with law.

19 4. The remaining \$55,851.00 of the defendant currency, plus
20 the interest earned by the government on that sum, and the
21 defendant Chevrolet Suburban 1500, shall be returned to claimant
22 in care of his attorney, Paul Gabbert. Said funds shall be
23 forwarded by check made payable to "Paul Gabbert, Attorney-Client
24 Trust Account," and shall be mailed to Paul Gabbert, Esq., 2115
25 Main Street, Santa Monica, California 90405.

26 5. Claimants hereby release the United States of America,
27 its agencies, agents, and officers, including employees and
28

1 agents of the Drug Enforcement Administration, from any and all
2 claims, actions or liabilities arising out of or related to this
3 action, including, without limitation, any claim for attorneys'
4 fees, costs or interest which may be asserted on behalf of the
5 Claimants.

6 6. The Court finds that there was reasonable cause for the
7 seizure of the defendants and institution of these proceedings.
8 This judgment shall be construed as a certificate of reasonable
9 cause pursuant to 28 U.S.C. § 2465.

10 DATED: 10/27/2009

11
12 **PHILIP S. GUTIERREZ**

13 THE HONORABLE PHILIP S. GUTIERREZ
14 UNITED STATES DISTRICT JUDGE

15 **Approved as to form and content:**

16 DATED: _____, 2009

17 GEORGE S. CARDONA
18 Acting United States Attorney
19 CHRISTINE C. EWELL
20 Assistant United States Attorney
21 Chief, Criminal Division

22 _____
23 STEVEN R. WELK
24 Assistant United States Attorney
25 Chief, Asset Forfeiture Section

26 Attorneys for Plaintiff
27 United States of America

28 DATED: _____, 2009

PAUL GABBERT

Attorney for Claimants
Annette Chacon and Roland Hurtado

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